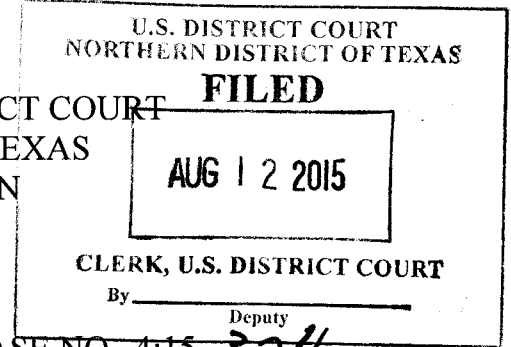


IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION



UNITED STATES OF AMERICA

v.

LEZLI OWENS (1)
CALEB SMITH (2)

§
§
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§
§
§

CASE NO. 4:15-324

CRIMINAL COMPLAINT

I, Kevin K. Brown, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

Conspiracy to Possess a Controlled Substance with Intent to Distribute

*Beginning sometime before February 2015, and continuing thereafter until in or around the end of March 2015, in the Fort Worth Division of the Northern District of Texas, defendants **Lezli Owens**, **Caleb Smith**, and others known and unknown, did knowingly and intentionally combine, conspire, confederate, and agree to engage in conduct in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C), namely to possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a schedule II controlled substance, in violation of 21 U.S.C. § 846.*

I am a Task Force Officer with the Drug Enforcement Administration and this Complaint is based on the following facts:

1. On February 26, 2015, Investigators of the Parker County Special Crimes Unit executed a search warrant at a residence in Weatherford, Texas. While executing the search warrant, Caleb **Smith** arrived at the residence. Investigators searched Smith, and found suspected methamphetamine, which was later determined to be 29.6 grams of methamphetamine.
2. On February 26, 2015, **Smith** waived his right to counsel and was interviewed by Parker County Investigators. **Smith** stated the methamphetamine he was arrested with came from Lezli **Owens**. **Smith** further stated that he obtained large amounts of methamphetamine from **Owens** for resale. **Smith** stated that he had been with **Owens** on several occasions when she acquired up to ten ounces of methamphetamine in Fort Worth, Texas.

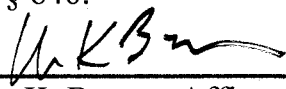
3. On March 3, 2015, Investigators with the Parker County Special Crimes Unit were conducting surveillance on **Owens** and **Smith**, who were in **Owens'** vehicle. During the surveillance, **Owens** and **Smith** went to a Wal-Mart located in White Settlement, Tarrant County, Texas. Surveillance was maintained on **Owens'** vehicle until it was later stopped by Weatherford Police in Weatherford, Texas. **Smith**, who was driving the vehicle, was arrested for an outstanding parole warrant. A search of the vehicle was subsequently conducted and approximately 119.5 gross grams of suspected methamphetamine was found and seized. Owens, who was in the vehicle, was arrested at that time.

4. On March 4, 2015, **Owens** waived her right to counsel and was interviewed by Parker County Investigators. **Owens** stated that she and **Smith** had been to a Wal-Mart located in Fort Worth, Texas, before her vehicle was stopped on March 3, 2015. **Owens** stated that she picked-up four ounces of methamphetamine from her source of supply at the Wal-Mart, and that she had paid \$2,000.00 for the four ounces of methamphetamine. **Owens** stated that **Smith** supplied \$1,000.00 for the purchase of these four ounces of methamphetamine.

5. On March 19, 2015, Parker County Investigators were advised that the examination on the phone belonging to **Owens**, which was seized on March 3, 2015, was complete. Parker County Investigators saw numerous narcotics-related text messages to several persons in the phone, including **Smith**.

6. A presumptive field test was conducted on samples of the suspected methamphetamine seized from **Smith** and **Owens**. The results were positive for methamphetamine. The gross approximate weight of the methamphetamine seized from **Smith** on February 26, 2015, was 29.6 grams, and the gross approximate weight of the methamphetamine seized from **Owens** on March 3, 2015, was 119.5 grams.

Although I have not listed all the facts regarding this conspiracy, I believe that the facts stated above establish probable cause that the above-named defendants, and others known and unknown, have violated 21 U.S.C. § 846.



Kevin K. Brown, Affiant
DEA - Task Force Officer

Sworn to before me, and subscribed in my presence on August 12th, 2015 at 10:23
9 a.m./p.m., in Fort Worth, Texas.



JEFFREY L. CURETON
UNITED STATES MAGISTRATE JUDGE